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DEPARTMENT OF FINANCE AND ADMINISTRATION
DIVISION OF HEALTH CARE FINANCE AND ADMINISTRATION
BUREAU OF TENNCARE
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IMPORTANT MEMO

DATE: September 4, 2014
TO: Medicaid Nursing Facility (NF) Providers
TennCare Managed Care Organizations
FROM: Jay Taylor, Deputy
Long-Term Services and Supports (LTSS) Audit and Compliance
SUBJECT: **QuILTSS Submissions Questions and Answers**

By now, you should have completed your online QuILTSS Bridge Payment Submission training. If not, we highly recommend that your facility complete the training as soon as possible and even attempt a practice submission. Please remember that **the deadline for QuILTSS Bridge Payment Submissions is 4:30 PM CT on September 15, 2014.**

We have received and responded to questions from several facilities as they have explored the submission process. We would like to share those questions and answers so that other facilities may benefit from these inquiries. I hope this is helpful.

QuILTSS Submission Questions and Answers

1. Could you please give me some direction on accessing the online video? I can get to the site and the video appears to load but will not play.

Answer: There are some internet browsers that are not supported by the video training software. You may want to install Google Chrome (https://www.google.com/chrome/index.html?hl=en&brand=CHNG&utm_source=en-hpp&utm_medium=hpp&utm_campaign=en). You should continue to use Internet Explorer (version 8 or below) for your TPAES submissions. If you decide to download another browser, be sure to not use it with TPAES. It may be helpful to install another browser on a different computer than the one that is used to access TPAES.

Alternatively, you can view these videos on YouTube using the links below:

- Part One: QuILTSS Bridge Payment Overview <http://youtu.be/4dGcX1506cY>
- Part Two: Quality Framework <http://youtu.be/mB26dxJdB0c>
- Part Three: Overview of the Submission Process http://youtu.be/4E_k7J0dMpY

- Part Four: Documenting Quality Measures—Satisfaction <https://www.youtube.com/watch?v=0H9zPq6z7yo&feature=youtu.be>
- Part Five: Documenting Quality Measures—Culture Change/Quality of Life <http://youtu.be/rvnOG3CgTx4>
- Part Six: Documenting Quality Measures—Staffing/Staff Competence <http://youtu.be/IpkW4vRTIG4>
- Part Seven: Documenting Quality Measures—Clinical <http://youtu.be/0R2Ved3ijFY>
- Part Eight: Bonus Points <http://youtu.be/hlxDMixDpfU>
- Part Nine: Completing Online Submission Process <http://youtu.be/zmMqU5AdFz8>

2. Do I need to submit proof that I viewed the training videos?

Answer: No. We do not need you to prove or validate that you viewed the training videos. We certainly hope that all facilities have viewed the videos and that watching them will be of assistance in preparing your submission.

3. How can I print the submission forms to enter my information on a hard copy for practice?

Answer: The best way to print the submission form is to go to http://www.tn.gov/tenncare/long_partnerstrn.shtml and select QuILTSS Bridge Payment Submission Training. Then, on the next page, toward the bottom, select Printable version of the submission form. That will open up a .pdf of the whole submission form (28 pages). This is an easier way to print than doing so from the on-line submission form because you must print one section at a time and cannot move to the next section until you answer the required questions.

4. What facility name should we use in the submission process?

Answer: You will need to use the facility name on the facility license.

5. According to the instructions, the attachments should be named [facility name]#.pdf. Does the facility name in the attachment have to be the facility name as it appears on the license? Generally the facility name on the license is a much longer name and in daily use, we have shorter names for the facilities. Can we use the shorter names when naming the attachment files?

Answer: So long as we can tie the file to your facility, you can use the shorter name. In the question of “Name of Facility as it appears on your license” you may want to put the short name in parentheses after the longer name so that we can follow your naming convention.

6. We conduct some surveys on an ongoing basis instead of only on specific dates. How do we enter that information on the submission form?

Answer: In the field that asks, “When did you conduct the survey?” (or the assessment), you can enter text. You may want to say “Ongoing throughout 7/13-6/14,” or whatever is accurate. You should then explain the methodology for conducting the survey in the appropriate section. For example, if the survey is “ongoing,” how many survey forms are distributed each month? How are the participants selected? How are the forms disseminated? How are they submitted by respondents? In addition, you will need to enter specific dates for the date of survey result analysis and date of that report. Please note that a comment card that is made available for

people to complete as desired is not a survey and will not be sufficient for award of points in Bridge Payment year.

- 7. We did not conduct a staff satisfaction survey for the period 7/1/13—6/30/14. We just completed a staff satisfaction survey in August. Can we submit this survey to receive points and receive payment for the first quarterly bridge payment?**

Answer: For the first quarter QuILTSS Bridge Payment, we will be accepting information about any satisfaction surveys that were conducted in the 12 months prior to 7/1/14 (7/1/13 – 6/30/14). In future quarters, we will be accepting information for satisfaction surveys completed since that time. So, we would not be giving credit for a satisfaction survey completed in August 2014 during this submission and payment cycle.

- 8. We conducted a My InnerView drill down survey on Choices and Preferences for residents. Would that qualify for Culture Change segment?**

Answer: In order to determine whether this constitutes “an assessment of person centered practices and/or culture change practices,” you must include the survey tool and all required documentation in your submission. We will make that determination as part of the evaluation process. It would not be proper for us to issue an opinion without review of the actual tool and outside of the submission process, since we do not have capacity to offer advance rulings on numerous other such inquiries.

- 9. Can we use percentages for the number of people who responded to the surveys?**

Answer: No. We need the numbers of people who responded to the surveys.

- 10. In reference to submitting proof of family council meetings, it states that to remain in compliance with HIPPA laws, we must not submit any documentation that includes resident names and/or information. My proof of conducting family council meetings consists of sign-in sheets that list the names of the residents. Can I submit the sign-in sheets with only the resident first names? Or will flyers suffice as proof? If not, what alternate proof is suggested?**

Answer: Provide whatever documentation that you can to demonstrate that a meeting occurred: fliers, minutes, notes, sign-in sheets, etc. However, these should not include Protected Health Information. If they do, you will need to remove that information.

- 11. Is the Resident/Family council or advisory committee supposed to be a council with both resident and family or can it be either all residents or all family members? The question that follows this one asks for the number of family members on the council.**

Answer: For purposes of the QuILTSS Bridge Payment submission, your Resident/Family Council/Committee could include either residents or families or both. You should answer the question about number of residents and number of family members. If you only have residents on the council/committee, then you should enter “0” or “None” in the family member question. For purposes of ongoing quality improvement activities, we strongly recommend that facilities establish a **Resident** Council (or at a minimum, a combined Resident/Family Council) and support residents in actively participating in and leading Council activities.

12. The directions ask us to attach the minutes of the most recent meeting. Would this be the most recent meeting within the July 1, 2013 to June 30, 2014 period, or would it be appropriate to attach minutes of a July or August 2014 meeting?

Answer: You should submit the evidence of your most recent meeting, regardless of when that occurred. Please be sure to delete Protected Health Information from your minutes (resident names, etc.).

13. Where can I find the spreadsheet to submit my staff retention information?

Answer: You can find it at http://www.tn.gov/tenncare/long_partnerstrn.shtml. You should select QuILTSS Bridge Payment Submission Training and then on the next page, at the bottom, click on Staff Roster for Value Based Purchasing Submission. That will open the Excel file for you. There are additional directions in the spreadsheet to assist you with entering information.

14. In the section where it refers to credit for "continuous employees" of the year - does this include employees within the entire facility or is it referring only to nursing/medical personnel and staff?

Answer: Yes, include all staff regardless of their position.

15. Do we count hospice staff that serve our residents in the staff retention section?

Answer: If the staff person is employed by the Nursing Facility, they should be counted. Employment is defined as: directly paid or paid by the NF through a contract; full-time or part-time staff; involved in direct care of the member or other services (facility, dietary, etc.). If the NF employs staff that specifically care for hospice residents, they should be counted. Hospice, Rehab or Therapy staff employed or contracted by the NF and paid by the NF should be counted, whether they are providing Medicare SNF services, including rehab, or hospice. If you are treating the worker as a staff person, you should list them on the roster. Please be reminded that the length of the contract with the company is not relevant; we are interested in the consistency of the individuals who interact with residents.

If, however, another agency employs the worker, and that agency is not contracted by the NF to provide these staff to your facility, then you should not count them. In the case of hospice, the NF is typically the contractor of the hospice agency and not the other way around. In that case, the hospice agency's staff do not count as NF staff.

16. We pay a contract rate to a rehab company (not a salary to a contract employee). Can we count them in staff retention?

Answer: Yes. Individual staff from the contracted rehab company who have consistently and continuously been at the facility interacting with residents from July 1, 2013 to July 1, 2014 should be counted and listed on the Staff Roster. Please be reminded that the length of the contract with the company is not relevant; we are interested in the consistency of the individuals who interact with residents.

17. My facility is a "Bronze" award winning facility. If I receive bonus points for this, how will it affect my reimbursement in October?

Answer: We have not formally decided if bonus points will be awarded during each quarter of the Bridge Payment year, if bonus point criteria will remain the same, or if bonus points earned in the first quarter will roll over from quarter to quarter.

18. Can I submit QAPI participation certificates in order to earn bonus points?

Answer: Bonus points will not be awarded for QAPI participation certificates. The documentation requirements for earning bonus points have been set forth on the Bridge Payment submission form.

19. Can I send a practice submission to you for review ahead of the actual submission?

Answer: All submissions should be made via the defined submission process and only “Actual Submissions” will be accepted, and only one “Actual Submission” per facility is permitted. There is a link on our QuILTSS Bridge Payment Submission training webpage and within the PowerPoint slides that gets you to the submission form online. It is essentially a survey that allows you to upload documents. There is the opportunity to do as many “practice submissions” as you would like. TennCare will not review any submission that is labeled as “practice.” When you indicate that your submission is an “Actual Submission” and acknowledge the confirmation on the final page of the submission, TennCare will review and evaluate the submission. You will not have an opportunity to adjust or amend your “Actual Submission.” We do not have the capacity to review a submission and provide feedback ahead of the “Actual Submission.”

20. Where is the bridge payment money coming from and why don't I have more specifics on how much my nursing facility will receive?

Answer: These payments for quality will be made using new revenue generated from the new assessment fee (i.e., new revenue *above and beyond* the money previously generated by the bed tax). Per the legislation that created this fee, the total collected will be 4.5% of statewide industry revenues. The assessment--both in total and for each facility--will be calculated using the most recently available cost report data that has been desk-reviewed by the Office of the Comptroller. Quality payments will be calculated for each facility based on the volume of Medicaid resident days and the percentage of total quality points earned for the quarter. Quality scores will be calculated each quarter (as described in the Quality Framework) to recognize changes in performance, and payments will be adjusted accordingly. Also dictated by the legislation, the total amount of quality payments during the bridge year will be 20% of the “additional” money generated by the assessment fee. It will be divided into fourths with a small set-aside in case a review determines that a facility’s payment should have been higher. Any unused moneys (from the set aside) will roll forward to the total amount available for the next quarter. The entire “fourth” will be paid out each quarter, and will depend on the number of facilities submitting quality data, the points each facility achieves, and the volume of Medicaid bed days for each submitting facility. This is why we can’t provide specific payment amounts at this time. However, the potential quality payment of any facility is not insignificant. Facilities with higher Medicaid resident volume and of course, those with higher quality performance have the opportunity to earn higher payments.